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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILLIAM WITTER,

Petitioner,

vs.

WILLIAM GITTERE, *et al.*,

Respondents.

Case No. 3:20-cv-00345-APG-CSD

**ORDER GRANTING
UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME
(FIRST REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a sixty (60) day enlargement of time, to and including February 25, 2025, in which to file and serve their response to the petition.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

There has no prior enlargement of Respondents' time to file said response, and this motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 26th day of December, 2024.

AARON D. FORD
Attorney General

By: /s/ Jeffrey M. Conner
JEFFREY M. CONNER (Bar. No. 11543)
Chief Deputy Solicitor General

DECLARATION OF COUNSEL

I, JEFFREY M. CONNER, declare under penalty of perjury:

1. I am an attorney employed by the Office of the Attorney General of the State of Nevada, and I make this declaration on behalf of Respondents' motion for enlargement of time in the above-captioned matter.

2. By this motion, I am requesting an enlargement of time to file Respondents' response Petitioner William Witter's petition. This response is currently due December 27, 2024. Respondents request an enlargement of sixty (60) days to, and including, February 25, 2025, to file the response. This is Respondents' first request for an extension of time.

3. Since this Court ordered a response to Witter's petition, in addition to the day-to-day press of business, I have been extremely busy handling a number of different matters including drafting the State's reply brief (and litigating a number of other procedural matters) in the appeal from an order dismissing the indictment involving Nevada's 2020 fake electors scheme, *State v. Degraffenried*, No. 82178 (Nev.); drafting two answering briefs in federal habeas appeals (*Bollinger v. Gittere*, Nos. 15-99007 and 23-99002 (9th Cir.), and *Brown v. Oliver*, No. 24-4725 (9th Cir.)); addressing a number of ongoing matters regarding compliance with the consent decree entered in *Davis v. Nevada*, 17-0C-0227-1B (1st Jud. Dist. Ct. Nev.) (a class action lawsuit addressing indigent defense in rural Nevada); and assisting with litigation of a complex state law case involving the intersection of water law and inverse condemnation, *Nevada v. Coyote Springs Inv., LLC*, No. 89534 (Nev.) and *Coyote Springs Inv., LLC v. Nevada*, A-20-820384-B (8th Jud. Dist. Ct. Nev.). Given the foregoing, Respondents require additional time to draft a response to the lengthy petition Witter has filed in this matter and respectfully request that this Court issue an order granting Respondents an extension of sixty (60) days, to and including February 25, 2025, to file the response to the petition.

4. I contacted opposing counsel, Assistant Federal Defender Stacy Newman, and she indicated that she has no opposition to this request.

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